



K.D.H.E.

DEC 17 1997

SOUTHEAST DISTRICT OFFICE
CHANUTE, KANSAS

December 15, 1997

Letter No. 97-04-12-145

Kansas Department of Health and Environment
Bureau of District Operations
1500 West 7th Street
Chanute, Ks. 66720

Attn: Victoria S. O'Brien, CHMM

Ref: Completed training per 40 CFR 265.16 (d) (4)

Attached is training documentation as requested per your letter of 11/4/97.

If you have any questions or need additional information, please contact me at (316) 331-8180.

J.L. Johnson
Quality Engineer

JLJ/ias

Attachments

cc: Larry Valentine
John Orozco
file

Airport Industrial Park
1 Freedom Drive
P.O. Box 946
Independence, KS 67301-0946
Phone 316•331•8180
Fax 316•331•6426



R00157222
RCRA RECORDS CENTER

14412

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11/20/97 **FIRST SESSION**

1. LABELING OF WASTE PRIOR TO FILLING A DRUM
 - A. INSTALL A HAZARDOUS WASTE LABEL WHEN STARTING A NEW WASTE DRUM. FILL OUT DATE STARTED AND TYPE OF WASTE IN DRUM.
 - B. OBLITERATE OLD MARKINGS IF DRUM HAS BEEN USED FOR OTHER CHEMICALS. **NOTE DO NOT MARK OUT THE UN DRUM MARKINGS.**
2. LABELING OF FULL WASTE DRUMS. NOTIFY D. ROGERS WHEN A FULL DRUM IS TRANSPORTED TO THE HAZ WASTE STORAGE BLDG.
 - A. HE WILL ATTACH THE 90 DAY LABEL WITH NECESSARY ADDITIONAL LABELS AND MOVE INTO THE STORAGE AREA (SOUTHWEST BAY AREA)
3. DRUMS ARE TO BE STORED WITH PROPER AISLE SPACING (MIN. 2 FT)
 - A. ALL CONTAINERS ARE TO REMAIN CLOSED, UNLESS ADDING OR REMOVING HAZARDOUS WASTE.
4. DRUMS TOPS ARE TO BE KEPT CLEAN AND DRY.
 - A. ANY SPILL OR LEAKAGE FROM TRANSFER PUMPS WILL BE CLEANED UP **IMMEDIATELY**.
5. ANY DRUM LEAKAGE/SEEPAGE WILL BE REPORTED IMMEDIATELY TO ANY MANAGER/SUPERVISOR, FOR ACTION.
6. HAZMAT STORAGE SHED WILL BE INSPECTED AND RECORDED EACH WEEK (LAST WORK DAY) BY THE METROLOGY LAB TECHNICIAN.
 - A. ANY DEFECTS SHALL BE CORRECTED ASAP AND DATE OF CORRECTION NOTED IN THE INSPECTION LOG.
 - B. THE QUALITY ENGINEER SHALL BE NOTIFIED IF ANY SPILLS ARE NOT CORRECTED WITHIN 2 HRS OF REPORTED DETECTION.
7. REVIEW OF IDENTIFICATION OF CHARACTERISTICS AND LISTING OF HAZARDOUS WASTE.
8. REVIEW OF MSDS SHEETS.
 - A. LOCATION OF MSDS IN MAIN OFFICE.
 - B. EACH WASTE PROFILE IN QUALITY OFFICE HAS MSDS FOR THAT WASTE.
 - C. SPECIFIC INFORMATION CONTAINED ON EACH MSDS.
9. PPE AVAILABLE
 - A. RUBBER OR PLASTIC APRONS
 - B. LATEX OR NITRILE GLOVES
 - C. FACESHIELDS, SPLASH GOGGLES, SAFETY GLASSES.
 - D. RUBBER BOOTS (24 INCH) OR 4 BUCKLE OVERSHOES.
 - E. DRAGER COMBITOX NOVA HALF MASK RESPIRATORS W/CHEMICAL CARTRIDGE FOR ORGANIC VAPORS.
 - I. EMPLOYEES MUST HAVE MEDICAL CLEARANCE AND FIT TEST BEFORE USING RESPIRATORS. (SEE SPILL RESPONDERS LIST)

1 Hour

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SECOND SESSION:

1. SELECTION OF CONTAINERS FOR HAZARDOUS WASTE DISPOSAL.
 - A. RECONDITIONED DRUMS (PURCHASED FROM CVILLE RECON)
 - B. EMPTY DRUMS WITHOUT DEPOSIT
2. SPILL RESPONSE.
 - A. A COPY OF SPILL RESPONSE WILL BE GIVEN TO EACH MANAGER/SUPERVISOR LISTING QUALIFIED RESPONSE PERSONNEL.
3. ROUTINE SPILL (LESS THAN THE RQ OF MATERIAL) AS DEFINED ON PAGE 6 PARA 5.1 OF INDEPENDENCE FACILITY INTEGRATED ENVIRONMENTAL RESPONSE PLAN (IFIERP)
 - A. NOTIFICATION OF ANY ROUTINE SPILL WILL BE TO ANY SUPERVISOR OR MANAGER.
 - B. RESPONSE WILL INCLUDE AT LEAST ONE OF THE QUALIFIED SPILL RESPONSE EMPLOYEES.
 - C. USE ROUTINE SPILL RESPONSE CHECKLIST (IFIERP) PAGE 7.
 - I. COPIES OF THIS CHECKLIST ARE LOCATED ON THE SPILL CART.
 - D. SPILL CART MATERIALS WILL NOT BE USED ON SMALL LEAKS, OR SMALL SPILLS. SHOP CLOTHS CAN BE USED FOR THESE TYPE OF CLEAN UPS. USED CLOTHS MUST BE RETURNED TO A AUTHORIZED (CLOSED LID) CONTAINER FOR WEEKLY PICKUP.
4. NON-ROUTINE SPILL (IN EXCESS OF RQ OF MATERIAL) AS DEFINED ON PAGE 8 PARA 5.2 OF THE IFIERP.
 - A. ANY EMPLOYEE SHALL NOTIFY THEIR SUPERVISOR, WHICH WILL IMMEDIATELY CONTACT THE INCIDENT/ALTERNATE COMMANDER.
 - B. THE INCIDENT/ALTERNATE COMMANDER WILL EVALUATE THE EXISTING AND POTENTIAL THREAT TO HUMAN HEALTH AND ENVIRONMENT AND IMPLEMENT THE APPROPRIATE MEASURES TO MINIMIZE ALL HAZARDS.
 - C. DETERMINE IS OFF SITE ASSISTANCE IS REQUIRED AND INITIATE THE PLANT EVACUATION PLAN.
 - D. IF NECESSARY, THE INDEPENDENCE FIRE DEPT. WILL BE RESPONSIBLE FOR INITIATING THE MONTGOMERY COUNTY REGIONAL HAZARDOUS MATERIAL RESPONSE PLAN.

INTERNAL SPILLS AND ACTIONS:

1. CLEANING.

ALL LIQUID CHEMICALS ARE STORED IN S/STEEL TANKS WITH SINGLE DRAINS. NORMAL LIQUID LEVELS ARE APRX 20 GAL.

 - A. RISK:
 - I. SEEPAGE/LEAK FROM TANK WELDS.
 - II. SEEPAGE/LEAK FROM DRAIN CONNECTIONS, OR VALVE.
 - III. RUPTURE AT DRAIN
 - B. CORRECTIVE ACTIONS:
 - I. USE PORTABLE CONTAINERS TO CONTAIN AND DRAIN TANK. FOR ALL OF THE ABOVE.
 - II. CLEAN UP WITH MOP/BUCKETS AND DISPOSAL OF CHEMICALS PER MANAGER/SUPERVISOR.

****NOTE** SANITARY DRAIN AT SINK IS PROTECTED BY A 2 INCH RISER. IF NEEDED, DRAIN AT NDI CAN BE CAPPED UNTIL CLEAN UP IS COMPLETED**

SECOND SESSION

DISCUSSED THE EQUIPMENT ON SPILL CART AND ITS USE.

REVIEWED FIRE ALARMS (MANUAL AND AUTOMATIC) IN HOUSE AND ACTION.